

Exhibit D

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Rust Coin Receivership
Time Detail for Conflict Receiver and Klein & Associates
January 1, 2020 to March 31, 2020

Date	Worker	Hours	Rate	Amount	Description
1/13/2020 WK		0.2	0.00	0.00	Review invoices from Manning Curtis. Time not billed.
1/29/2020 WK		0.1	250.00	25.00	Respond to D. Castleberry on transfers from Edward Jones, send accounting documents.
1/30/2020 WK		0.6	250.00	150.00	Review information from Edward Jones attorney, send documents showing payments to Edward Jones and copy of Percell will; request SSN from Parr Brown.
2/14/2020 WK		0.1	250.00	25.00	Read answer filed by Edward Jones.
3/13/2020 WK		0.3	250.00	75.00	Review files on Edward Jones; read correspondence with parties on discovery; read draft attorney planning meeting report, respond to D. Castleberry with comments.
3/16/2020 WK		2.4	250.00	600.00	Read correspondence from Edward Jones attorney on discovery limits; read account documents for V. Percell; make list of issues to address with attorney (.4); call with E. Christiansen, notes of call; email C. Love and D. Castleberry with comments about approach for Edward Jones; send request to E. Christiansen for further research on possible recipient of Rust Coin funds (.9); review files for other targets; email K. Collins on transfers to Tilley; give directions to D. Castleberry on subpoenas to Percell siblings; research docket in Gregory v. Zions; email S. Waterman on status and effect of amended complaint (.7); read responses from Zions, Tilley (.1); draft tolling agreement extension for USU, send (.3).
3/17/2020 WK		1.9	250.00	475.00	Call with D. Castleberry on conflicts check for other potential defendants, sending subpoenas to Percells, Receiver discussion with E. Christiansen (.5); read documents from Parr Brown on payments to Percells (.1); call with D. Moers-Putze on Percell payments, personal representative for Richard Percell (.7); notes of call, send summary to D. Castleberry (.6).
3/23/2020 WK		1.8	250.00	450.00	Review files, draft letter to S. Cottingham requesting information on payments to V. Percell, actions taken by Swarz.
3/27/2020 WK		0.1	250.00	25.00	Call with D. Castleberry on information needed for initial disclosures to Edward Jones, sending subpoenas to Percells.
3/30/2020 WK		1.0	250.00	250.00	Email Utah State University on tolling agreement; emails with D. Castleberry; receive tolling agreement, sign and send to USU; notify Cynthia Love, request information on similar cases (.4); read draft subpoenas to Percells, create redline, send comments to D. Castleberry, send with comments (.6).
3/31/2020 WK		0.1	250.00	25.00	Read response from C. Love on other recoveries against charities.
Total		8.6		2,100.00	



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KLEIN & ASSOCIATES, PLLC
P.O. Box 1836
Salt Lake City, UT 84110

Statement Date: 03/31/2020

Account No: 21873

Previous Balance	Fees	Expenses	Advances	Payments	Balance
21873-00010 Edwards Jones					
4,414.50	5,492.00	0.00	0.00	-2,836.00	<u>\$7,070.50</u>



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 Account No: 21873-00010
 Statement No: 58641

Edwards Jones

Fees

		Hours	
03/04/2020			
MML	Research re deadline for filing Attorney Planning Meeting Report; correspond with opposing counsel re same; draft proposed Attorney Planning Meeting Report.	2.50	550.00
DCC	Review e-mail from opposing counsel; email exchanges with MMLongson re same; identify follow up re APMR, etc.; review e-mail from MMLongson re APMR to opposing counsel.	0.80	280.00
03/05/2020			
MML	Revise Attorney Planning Meeting Report and Discovery Plan and send to DCCastleberry re review.	0.30	66.00
DCC	Review e-mail from MMLongson; review draft APMR and note follow up re same.	0.50	175.00
03/07/2020			
DCC	Read draft APMR and send email to MMLongson re changes to make.	0.50	175.00
03/09/2020			
DCC	Review e-mail and APMR from MMLongson to opposing counsel.	0.20	70.00

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		Hours	
	MML	Revise Attorney Planning Meeting Report and send to opposing counsel.	0.50 110.00
03/10/2020			
	MML	Review documents and correspondence from Receiver in preparation for call; hold Attorney Planning Meeting phone call with opposing counsel; review edits to Attorney Planning Meeting Report draft from opposing counsel.	1.30 286.00
	DCC	Read e-mail from MMLongson re APMR with suggested changes from opposing counsel; conference with MMLongson re same.	0.40 140.00
03/12/2020			
	MML	Confer with DCCastleberry re opposing counsel's edits to Attorney Planning Meeting Report; send same to client.	0.30 66.00
	DCC	Telephone conference with Wayne Klein re discovery and APMR; review e-mail from MMLongson re APMR; identify follow up re same; review e-mail from opposing counsel.	1.00 350.00
03/13/2020			
	MML	Draft/revise Attorney Planning Meeting Report per correspondence with opposing counsel; draft and file Stipulated Motion for Scheduling Conference.	1.20 264.00
	DCC	Analyze issues re timing for AMPR report; e-mail exchanges with MMLongson, with receiver, and with opposing counsel; e-mail exchanges with opposing counsel; review order filed by court; review documents from opposing counsel; work on APMR with MMLongson and opposing counsel; file with court request for hearing and exchanges re same.	1.50 525.00
03/16/2020			
	DCC	Read e-mail from receiver re follow up with documents in case; review e-mail from receiver to opposing counsel; review e-mail from receiver re follow up subpoenas in case; review e-mail from Cynthia Love.	0.70 245.00
03/17/2020			
	DCC	Read e-mail from Cynthia Love re follow up; review emails from David Mooers-Putzer; review documents from David	

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		Hours	
	Mooers-Putzer; review e-mail from receiver; telephone conference with receiver.	1.00	350.00
03/23/2020			
MML	Confer with DCCastleberry re initial disclosures.	0.30	66.00
03/26/2020			
DCC	Work on issues re initial disclosures and draft e-mail to receiver re same; draft e-mail to receiver re subpoenas to issue.	0.50	175.00
03/27/2020			
CAJ	Draft subpoenas duces tecum to Vanessa Percell and Charlotte Percell; review file for location of both witnesses; draft notice of intent related to same.	1.00	155.00
DCC	Telephone conference with receiver re case.	0.30	105.00
03/30/2020			
MML	Review and revise CAJones subpoena drafts and Notice of Intent; draft Subpoena Riders for Percell subpoenas; correspond re same and initial disclosures with conflicts counsel.	2.00	440.00
DCC	Conference with MMLongson re follow up re initial disclosures and provide instruction re same; review e-mail from MMLongson to counsel re initial disclosures; review drafts of subpoenas and draft e-mail to receiver re same; review edited subpoena and draft follow up e-mail to receiver re same; edit subpoena and draft e-mail to MMLongson and CAJones re same.	1.00	350.00
03/31/2020			
DCC	E-mail exchanges with CAJones and MMLongson re subpoenas; follow up email exchanges re same; e-mail exchanges with Cynthia Love and analyze issues re expert, etc.	0.90	315.00
MML	Correspond internally and with Receiver's counsel re subpoenas to Charlotte and Vanessa Percell.	0.50	110.00
CAJ	Communications with MMLongson and DCCastleberry re		

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	Hours	
subpoenas to the Percell's; revise both SDT's; revise Notice of Intent.	0.80	124.00
For Current Services Rendered	20.00	5,492.00

Recapitulation			
<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
David C. Castleberry	9.30	\$350.00	\$3,255.00
Cortney A. Jones	1.80	155.00	279.00
Mitch M. Longson	8.90	220.00	1,958.00

Total Current Work	5,492.00
Previous Balance	\$4,414.50

<u>Payments</u>		
03/23/2020	Payment Received Commodity Futures Trading Comm Check # 256	-2,836.00
	Balance Due	<u>\$7,070.50</u>

Taxpayer ID # 84-1395129



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Account No: 21873

Previous Balance	Fees	Expenses	Advances	Payments	Balance
21873-00020 Utah State					
0.00	400.00	0.00	0.00	0.00	<u>\$400.00</u>

Taxpayer ID # 84-1395129



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Utah State

Fees

		Hours	
03/16/2020			
DCC	Review e-mail from receiver to general counsel at Utah State re claims; review e-mail from general counsel re tolling agreement.	0.30	120.00
03/27/2020			
DCC	Telephone conference with Receiver re tolling agreement.	0.20	80.00
03/30/2020			
DCC	Email exchanges with Receiver; e-mail exchanges with MMLongson; and e-mail exchanges with Utah State's counsel and assistants re tolling agreement and complaint, if needed; review e-mail from receiver re fully-executed tolling agreement; draft e-mail to MMLongson re same; review follow up emails from Utah State.	0.50	200.00
	For Current Services Rendered	1.00	400.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
David C. Castleberry	1.00	\$400.00	\$400.00

Total Current Work 400.00

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Balance Due \$400.00

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Statement Date: 03/31/2020
Account No: 21873

Previous Balance	Fees	Expenses	Advances	Payments	Balance
21873-00030 Zions Bank					
0.00	160.00	0.00	0.00	0.00	<u>\$160.00</u>

Taxpayer ID # 84-1395129



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Zions Bank

Fees

		Hours	
03/16/2020			
DCC	Read e-mail from receiver re follow up re case.	0.20	80.00
03/27/2020			
DCC	Telephone conference with receiver re matter.	0.20	80.00
	For Current Services Rendered	0.40	160.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
David C. Castleberry	0.40	\$400.00	\$160.00

Total Current Work 160.00

Balance Due \$160.00



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Statement Date: 03/31/2020
Account No: 21873

Previous Balance	Fees	Expenses	Advances	Payments	Balance
21873-00040 Tilley Estate & Gayle Winterrose					
0.00	160.00	0.00	0.00	0.00	<u>\$160.00</u>



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Tilley Estate & Gayle Winterrose

Fees

		Hours	
03/16/2020			
DCC	Read e-mail from receiver to Kent Collins re tolling agreement.	0.20	80.00
03/27/2020			
DCC	Telephone conference with receiver re matter.	0.20	80.00
	For Current Services Rendered	0.40	160.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
David C. Castleberry	0.40	\$400.00	\$160.00

Total Current Work 160.00

Balance Due \$160.00